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ABSTRACT

Critics have stated that the present system of accreditation stifles innovation. Because of this, a proposal has been made by the United States Office of Education to develop its own standards for deciding which colleges and universities should receive federal funds. Therefore, institutions of higher education would be subjected to both nongovernmental accreditation and a federal system of eligibility determination. In dealing with this problem, the organization of the present system of accreditation was discussed emphasizing the need for a unified, national system of accrediting all higher education institutions, proprietary and specialized. An example of the recognition of this need was the report of the merger between the National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education. A merger of this type then called for a look at the standards and criteria used in accreditation. The role of the total educational community was stressed because of the increasing involvement of state legislatures. The pressures on the organization of accreditation by the federal and state governments and collective bargaining groups left the colleges and universities in the middle. Nongovernmental accreditation can survive only through the unity of the accrediting community. (BRB)

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Accreditation: "Federalization" or "Nationalization?"

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ACCREDITATION: "FEDERALIZATION" OR "NATIONALIZATION?"

National Commission on Accrediting

Executive Director's Annual Report

March 1, 1972

Accreditation has been the focal point for a number of conflicting opinions for many years. The proponents of accreditation point out that it serves as a catalyst for improvement and generally upgrades the quality of institutions and their programs of study. Opponents of the system claim that accreditation is frequently irrelevant to good education and serves as an inhibiting factor in the process of innovation and change.

As indicated, accreditation has been subject to criticism for some time; however, in recent months the number of critics of accreditation has multiplied. The attacks—or constructive criticisms as some might prefer to term them—have come from a variety of sources: government officials, representatives of schools and colleges, foundation officials, and from those engaged in accrediting.

Much of the criticism has been based upon prejudice and limited information. Some, however, has been well-meaning and has been based upon accurate information. Most of the critics have been arguing that certain elements in accreditation should be changed in order that accreditation may remain a nongovernmental activity. There are some, however, who have no desire to reform or change accreditation, but rather are interested primarily in replacing our system of non-governmental accreditation with a system of state or federal accreditation.

Although currently the United States Office of Education relies largely on accreditation as a basis for determining eligibility for federal funding, the proposal has been advanced during the past year that USOE should develop its own standards for deciding which colleges and universities should receive federal funds, thus separating accreditation and eligibility determina-

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tion. Such a plan would possibly subject the institutions to both nongovernmental accreditation and also a set of standards for eligibility purposes that, although minimal, would be the equivalent of accreditation.

These suggestions for the inauguration of a federal system of eligibility determination stem from the charges that accreditation stifles innovation. Accrediting agencies, various task force reports argue, are inflexible and resistant to change. The fact that virtually every accrediting operation provides considerable opportunity for, and encouragement to, innovation and experimentation is seldom noted.

The conclusions of the federal task force may have some validity, but what organization or institution in our society does not inherently resist change? Any entity, social, human, or material, with any form or substance, resists change, including the federal government. And one has cause to wonder whether a new federal system would not become even more rigid in a matter of months than the agencies which currently exist. When one considers the matter, he is compelled to ask what federal agency, bureau, or department would serve as a model of flexibility and responsiveness, to say nothing of efficiency.

These criticisms of accreditation are cited because they say something about the type and intensity of the issues under discussion. Obviously it will take a great amount of good will, flexibility, and responsiveness to effect solutions; however, events of the past year give every indication that the climate is now favorable and that the issues can be resolved within the framework of nongovernmental accreditation—that is, if the chance is provided without governmental intervention at a time when accreditation is in a period of great transition.

The major issue in accreditation perhaps is its organization. There seems to be developing a common body of thought that the organization of accreditation must take into account a concern for the public interest. Although it may be a bit too early to count the returns and declare that a consensus has been reached on this point, there is a clear recognition that accreditation is involved with the public interest. The manner in which accreditation functions in our society makes this fact virtually indisputable. Voluntary, nongovernmental accreditation is the single most important indicator of institutional quality. Funding agencies, including the federal government, rely on accreditation to establish eligibility. Licensure, registration, and certification agencies make extensive use of the process as a means of protecting the public from ill-prepared practitioners.

In these cases, accreditation can act in the public interest.

But, on the other hand, accreditation can be used in ways which are not in the public interest. Mismanaged and misused, it can limit entry into the professions; it can shield institutions and programs from constructive pressures for change; it can consort with registration, certification, and licensure to require education beyond what is needed for competence in a particular field. It can be used to impose the desires and wishes of professional groups upon the educational programs of institutions—desires and wishes which may have little or no educational value or significance. This is not to say that all accrediting activities can be so charged, but it is possible that accreditation has been misused on occasion.

It is because accreditation can act in, or act against, the public interest that accreditation's organization is called into question. As currently organized, accreditation is not widely representative of societal interests. Because it is so clearly affected with the public interest, more and more individuals are arguing that representation in accreditation's governance should reflect this fact.

One facet of the organization issue revolves around the development of a national system of nongovernmental voluntary accreditation as opposed to a government-operated federal system. Institutional accreditation has developed along both regional and national lines, regionally for institutions of higher education and nationally for other types and levels of institutions. Accreditation of certain curricula such as architecture, engineering, law, medicine, professional degrees in psychology, and theology has developed as specialized accreditation at the national level. This form of accreditation has tended to be superimposed on, or to be in addition to, institutional accreditation.

At the higher education level, articulation and coordination of institutional and specialized accreditation have been problems; so has the fact that all institutions have not had access to the same accrediting agency. Previously, proprietary institutions have been excluded from consideration by some agencies, other agencies have refused to consider for accreditation certain special-purpose institutions. The existing situation has been referred to by one scholar of organization as a Balkanized structure.

At the present time when so much discussion is in evidence relating to external degree programs and nontraditional study and when there are so many new and

different contractual arrangements being developed between schools and profit-making organizations, we must take another very careful look at the need to include proprietary institutions and organizations within the purview of the accrediting organizations. If we do not, the public will have no valid basis for comparison of the programs offered in the nonprofit and the proprietary domains. If we do not make some moves in the direction of becoming more inclusive rather than more exclusive, we shall have no one to blame except ourselves for having duplicating and competing systems of accreditation come into being.

For accreditation to serve society effectively, many argue that accreditation should develop into a national system, evaluating institutions without restrictions to their type of control and purpose and articulating institutional and specialized accreditation. If this could be done, perhaps institutional accreditation could be improved to the extent that specialized accreditation could be reserved almost entirely for those areas directly concerned with the public health and safety and selected other vital areas.

It is significant that progress is being made on this issue. The National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education have agreed to the principle of merger of these two organizations. A committee has been appointed to develop the bylaws for the new organization.

The merger will bring together the two principal centers of influence in nongovernmental accreditation. Under one board and with a single office, there will soon be a unified voice to speak for all accreditation in postsecondary education. It would be my own hope that ways and means can be devised to form for elementary and secondary accrediting efforts a similar general organizational pattern, if not immediately, at least in the foreseeable future.

In addition, the Federation of Regional Accrediting Commissions of Higher Education is moving rapidly toward a national stance for institutional accreditation. The Federation, under a plan currently being acted upon by the regional associations, will develop national standards and procedures for institutional accreditation to be regionally administered.

A second major issue in accreditation, and one which seems to be growing in intensity, is the validity of the accrediting process. The questions being asked with increasing frequency and vigor are: Are the standards and criteria used in the accrediting process educationally

sound? Can it be demonstrated that standards and criteria are the result of a data base which supports them? Do they make a difference?

Accrediting agencies, in the main, are just getting around to facing this issue. This past year, the National Commission on Accrediting held a seminar on the validation of accrediting standards for representatives from postsecondary accrediting agencies. With growing emphasis on non-traditional study, the open university, the university without walls, etc., standards and requirements of accrediting agencies will be increasingly called into question.

Few would disagree with the assertion that standards and criteria for accreditation have been determined mainly by consensus as to what is required for a sound educational institution or program. Standards and criteria represent professional judgments. They are usually very generally framed so as to accommodate extensive professional judgment in their application.

It is quite possible that accreditation is bearing the brunt of criticism that should be directed more generally at the total educational community. The science of educational measurement has not been very exact. There is little consensus on what should be the nature of the finished product when it leaves our educational institutions. There is probably even less agreement on the methods of developing that product. Accreditation will necessarily have to reflect these factors. In offering this extenuating circumstance, the intent is not to explain away this issue but rather—with the financial squeeze currently affecting all of our educational programs—to point out that accreditation should examine its requirements and procedures to assure as far as possible that they are valid and not the whims or desires of special interest groups.

Pressures upon accrediting activites are coming not only from the federal level, but also from the state level. For example, one state recently enacted legislation which authorizes the State Board of Higher Education to accredit colleges and universities. Consequently, in addition to the approval or accreditation afforded by states at the elementary and secondary levels, collegiate-level institutions also become subject to state accreditation.

A number of states, including Florida, Michigan, Texas, and Washington have enacted legislation that applies to various aspects of faculty working conditions, including faculty load, restrictions of the number of graduate students an institution may accept, etc. All

of these legislative actions have implications for accrediting activities that have previously been considered to be within the purview of the voluntary, nongovernmental agencies.

Legislative action at the state level has also brought forth additional budgetary controls, so that now state-assisted institutions of higher education have layer upon layer of budget reviews before a final budget may be adopted.

There remain only three states with no coordinating boards. These are Nebraska, Delaware, and Vermont, and two of these have given indication that the formation of a governing or coordinating board is in the planning stage. During the past year twenty-one states modified their governing structures for higher education and in all cases the modifications brought forth strengthened controls that remove some of the decision-making powers from the individual institutions. At the last session of the Arkansas legislature the Board of Higher Education was made a department of the state government, with the usual executive and legislative controls over such departments. Other states are moving in the same direction.

Many of these developments are producing a power play between the state legislative and executive branches, with the schools and the universities caught in the middle.

One must add to these pressures the fact that collective bargaining activities are producing a parallel or counter system of accreditation. The various groups engaged in collective bargaining activities are mandating not only salary arrangements, but also working conditions including teaching loads, tenure arrangements, and other factors, thus removing from the accrediting organizations the power to determine and enforce such standards.

In my opinion we have come perilously close to losing the drive and influence of nongovernmental accreditation. Whether more state and federal involvement will come probably will depend upon the steps the accreditation community can take during the next few months.

Fortunately, the accreditation community is no longer ignoring its problems. We now are ready to grapple with the major issues in our field. Today we have more creative thinking among students, faculty, and administrators than ever before in American educational history. We have moved slowly in the past, but the time for forceful action has come.

At the end of an exciting and eventful year such as the past one, one is tempted to ask the question: What can one do for an encore after such a year? It seems safe to respond by saying that the next several years will be even more significant and vital to the total area of accreditation, for the manner in which we respond to the challenges of the merger of the National Commission on Accrediting and the Federation of Regional Accrediting Commissions of Higher Education will in large measure determine whether the concept of nongovernmental accreditation will survive.

It seems appropriate to point out, without seeming to be unduly boastful, that much has already been accomplished. The study of new techniques for evaluation being undertaken by the Federation under the direction of Dr. Norman Burns, can contribute immeasurably to the strengthening of the accrediting enterprise. The several studies being cosponsored by the National Commission on Accrediting, particularly the Study of Accreditation of Selected Health Educational Programs, can bring new understandings and direction to the complex specialized accrediting areas. It is also significant to note the growing recognition by the National Commission on Accrediting that professional organizations cannot be given carte blanche recognition for accrediting specialized programs, but rather should be reviewed in terms of the particular levels at which accreditation is needed to protect the social interest. All of these ventures point toward a new and exciting period in the accrediting arena.

It is true that government's influence over the way we live and work has become so pervasive that government presence is now felt in almost every aspect of life. During forty years of depression, war, rising free-world burdens, and growing national affluence, education has had to learn to live with expanding government regulation, controls, and other programs affecting our institutions, our economy, our health, and survival itself. Nevertheless, it does not seem necessary or appropriate to permit governmental influence and control to extend to the point at which it would be possible for the bureaucracy to determine what should be taught or how the programs should be presented. The time is at hand for the entire postsecondary education community to rally to the support of nongovernmental accreditation.

In concluding this seventh annual report which I have had the privilege of submitting as executive director of the National Commission on Accrediting, I should like to express my deep and sincere appreciation for the continuing interest of the Board of Commissioners

of this organization. No agency could have a more dedicated group of men and women determining the policy for the coordination of professional and specialized accreditation in higher education. Certainly, if all elements in the postsecondary education community had the same depth of understanding and concern as this group, most of the problems mentioned in this report would not be present today. In addition, I should like to thank the executives and board members of the host of accrediting organizations, who through their cooperation make it possible for the National Commission on Accrediting to perform its various tasks. Finally, I wish to express my gratitude to the staff of the National Commission on Accrediting. Without their work, far beyond the call of duty, this organization would be almost nothing. One of the rare privileges of a professional career extending over almost thirty years is that of working with capable, intelligent, and dedicated people. A continuation of these delightful experiences is one of the things that constitutes a suitable encore for the excitement of this past year.

Respectfully submitted,

Frank G. Dickey

Frank G. Dickey
Executive Director

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